

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

Plaintiffs,

v.

**COMMONWEALTH OF PUERTO RICO,
et. al.**

Defendants.

CIVIL NO. 12-2039 (GAG)

**MOTION FOR LEAVE TO FILE PRPD'S FOURTH PROGRESS REPORT IN
COMPLIANCE WITH REQUIREMENT 261 OF THE AGREEMENT**

TO THE HONORABLE COURT:

COME NOW the COMMONWEALTH OF PUERTO RICO and the PUERTO RICO POLICE DEPARTMENT, through the undersigned counsel, and respectfully allege and pray as follows.

1. In accordance with Paragraph 261 of the Agreement for the Sustainable Reform of the Puerto Rico Police Department, PRPD submitted a sealed version of its Fourth Status Report on July 7, 2016 to the Court, the Technical Compliance Advisor and counsel for the Department of Justice.
2. PRPD respectfully requests leave to file its Fourth Status Report unsealed.

WHEREFORE, PRPD respectfully requests that this Court grants leave to file PRPD's Fourth Status Report.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on August 29, 2016.

CÉSAR R. MIRANDA RODRÍGUEZ
Secretary of Justice

MARTA ELISA GONZÁLEZ Y.
Deputy Secretary
General Litigations Office

WANDYMAR BURGOS VARGAS
Director
Federal Litigation Division
Department of Justice

S/JOEL TORRES ORTIZ

Joel Torres Ortiz
U.S.D.C. NO. 302311
Federal Litigation Division
Department of Justice
P.O. Box 9020192
San Juan, P.R., 00902-0192
Tel. (787) 721-2900, ext. 2647,2650,2624,2606
Fax (787) 723-9188
joeltorres@justicia.pr.gov